

ELECTRONICALLY FILED - 2021 April 5 5:48 PM - SCPSC - Docket # 2020-218-E - Page 1 of 4

Please note that these Requests for Production and Interrogatories are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel should be provided to counsel for DEC through supplemental responses as soon as possible after such identification.

1. Please produce the requested information and documents, and organize and label them to correspond with the numbers in the Request. Documents attached to each other should not be separated.

2. Please provide responses to the following data requests electronically via email to [Katie.Brown2@duke-energy.com](mailto:Katie.Brown2@duke-energy.com) and [swellborn@robinsongray.com](mailto:swellborn@robinsongray.com). To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 on or before April 26, 2021.

3. Please execute the Certification that follows these Requests.

Dated this 5th day of April, 2021.

s/Samuel J. Wellborn  
Samuel J. Wellborn  
ROBINSON GRAY STEPP & LAFFITTE, LLC  
Post Office Box 11449  
Columbia, South Carolina 29211  
Telephone: (803) 929-1400  
[swellborn@robinsongray.com](mailto:swellborn@robinsongray.com)

*Attorney for Duke Energy Carolinas, LLC*

### **INTERROGATORIES**

1-1 Please provide the following information for each witness you intend to provide testimony in the above-referenced docket:

- a) Full name;
- b) Subject matter for which the witness intends to testify;
- c) Current occupation;
- d) Employer; and
- e) Address.

**RESPONSE:**

1-2 Please provide a summary of the education and professional experience of each witnesses you intend to provide testimony in the above-referenced docket.

**RESPONSE:**

1-3 Is any witness you intend to provide testimony in the above-referenced docket the author of "Irradiated," the attachment to your "testimony" filed in the docket on December 8, 2020, or was "Irradiated" prepared at their direction and under their supervision? If so, please identify the witness.

**RESPONSE:**

### **REQUEST FOR PRODUCTION**

1-1 Please provide the provide the curriculum vitae or résumé for each witness you intend to provide testimony in the above-referenced docket:

**RESPONSE:**

**CERTIFICATION**

I, **Aleksy Kadoshnikov**, state that the contents of these Responses to Interrogatories and Requests for Production are true, accurate and correct to the best of my knowledge, information and belief. I certify that the foregoing statement made by me is true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

---

(SIGNATURE)

---

(DATE)